

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

In re:

Gates Community Chapel of Rochester, Inc.
d/b/a Freedom Village USA
d/b/a Operation Mercy

CHAPTER 11

Debtor.

BK No.: 18-20169

**APPLICATION FOR AN ORDER AUTHORIZING THE EMPLOYMENT
OF GALVIN REALTY GROUP, INC. AS REAL ESTATE BROKER**

The Debtor-in-Possession, Gates Community Chapel of Rochester, Inc. (the "Debtor") by and through its counsel, Dibble & Miller, P.C., and in support of its Application for an Order authorizing the employment of Galvin Realty Group, Inc. (the "Broker"), in accordance with 11 U.S.C. §§ 327 and 328, and Fed. R. Bankr. P. 2014, as the Debtor's real estate broker for the sale of some real property located in and around Yates County, State of New York, states as follows:

1. The Debtor filed a Voluntary Petition for Relief under Chapter 11 of the United States Bankruptcy Code on February 23, 2018. The Debtor continues to conduct its business and affairs as a debtor-in-possession. No official committee has been appointed by the Office of the United States Trustee.
2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334.
3. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.
4. This Motion is a "core" proceeding as the term is defined under 28 U.S.C. § 157(b)(2).
5. The Debtor is a not-for-profit corporation formed under Article 8 of the New York Religious Corporation Law, with a principal place of business located at 5275 State Rt. 14,

Town of Lakemont, County of Yates, State of New York, 14857. The Debtor is a Christian religious organization.

6. By this Application, the Debtor seeks authorization to employ the Broker to act as listing agent for sale of some real property located in and around Yates County, State of New York. The Debtor owns significant real property that is not necessary for its operations, and intends to market some of its real property for sale in order to generate sufficient funds to pay all allowed claims in full.

7. Debtor intends to bring additional applications to employ real property professionals including appraiser, surveyor and architect. As reflected in the schedules, the Debtor owns over 1,100' of undeveloped lakefront along Seneca Lake, in addition to significant acreage that could be sold as tillable farmland, available for vineyards, residential developments and/or commercial enterprises such as wineries or other similar uses to take advantage of the prime location in the heart of the Finger Lakes region, some of which is along the Seneca Lake Wine Trail.

8. The Debtor believes that the employment of Broker is its best interests. Broker has stated its desire and willingness to act in this case and render the necessary professional brokerage services with respect to the real property intended to be marketed. The Broker has the requisite experience and skill to properly market the real property on a nationwide basis. The Debtor believes that national exposure of this prime real property would maximize return for the estate. The professional experience and qualification of the Broker is attached hereto as Exhibit "A".

9. Filed with this Application are the Affidavits of John "Thomas" Galvin, Jr. and Meredith L. Galvin-Silverman. The Debtor believes that the employment of Broker pursuant to

11 U.S.C. § 327(a) and Fed. R. Bankr. P. 2014 is proper, appropriate, and in the best interests of the estate.

10. The Debtor has agreed to compensate Broker for its services on a percentage basis in accordance with Broker's ordinary and customary rates for services of this type; six percent (6%) of the sales price which commission, consistent with agreements entered into in the real estate profession, will be paid ½ to Broker and ½ to the buyer's agent unless otherwise agreed and approved by the Court. Broker has not received any retainer in this matter and will be paid from the proceeds of the sale of the Properties, after the sale is approved by the Court. All fees of Broker in this case will be subject to allowance by the Court and will be paid only after approval by the Court.

11. To the best of the Debtor's knowledge, Broker does not represent nor have connections with any parties in this case, and does not hold or represent an interest adverse to the estate in connection with the employment proposed by this Application, as set forth in the Affidavits of John "Thomas" Galvin, Jr. and Meredith L. Galvin-Silverman..

WHEREFORE, the Debtor respectfully requests that this Court grant the relief requested herein, and for such other and further relief as is just and proper.

Dated: March 20, 2018

Dibble & Miller, P.C.

BY: /s/ Mike Krueger, Esq.
Mike Krueger, Esq.
55 Canterbury Rd.
Rochester, New York 14607
(585) 271-1500

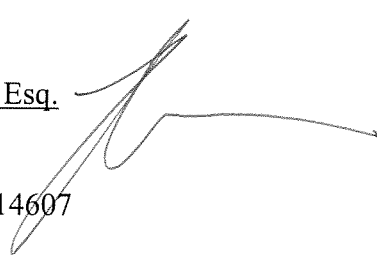


Exhibit A

Exhibit A

Exhibit A

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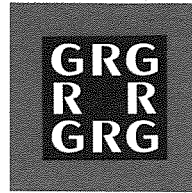
Exhibit A

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John "Thomas" Galvin, Jr.
CCIM, MAI, CPM
President
tgalvin308@gmail.com



Meredith L. Galvin-Silverman
Vice President
merisilver@yahoo.com

PROFESSIONAL QUALIFICATIONS

of
JOHN "THOMAS" GALVIN, JR.,
CCIM, MAI, CPM
President

PROFESSIONAL MEMBERSHIPS:

Member	Realtors National Marketing Institute (CCIM)
Member	Appraisal Institute (MAI)*
Member	Certified Member of the Institute of Real Estate Management (CPM)
Past President	Institute of Real Estate Management
Realtor Member	Real Estate Board of Rochester
Past Chairman	Management Committee of the Real Estate Board of Rochester

EDUCATION:

Graduate of University of Rochester – B.S. Degree; Major in Economics, Minor in Business Administration Banking and Mathematics.

SPECIALIZED EDUCATION:

Institute of Real Estate Management sponsored seminars:

- Practical Methods for Successful Property Management (Boston)
- Analysis and Management of Investment Property (Dallas)
- The Feasibility Study Condominium and Cooperative
- Development Management
- Managing the Management Office
- Office Building Leasing, Development and Management

*The Appraisal Institute conducts a voluntary program of continuing education for its designated members. MAIs who meet standards of this program are awarded periodic educational certification. I am certified under this program.

Appraisal Institute sponsored seminars:

- Principles of Real Estate Appraisers I (Ohio State University)
- Urban Properties II (University of Georgia)
- Techniques and Mathematics of Capitalization VI (University of Georgia)
- Investment Analysis VI

GALVIN REALTY GROUP, INC.

Realtors National Marketing Institute sponsored courses:

- Real Estate Income Taxes
- Updated to Tax Reform Act 1986
- Commercial and Investment Real Estate Analysis, 101
- Fundamentals of Creating a Real Estate Investment, 102
- Advanced Real Estate Taxation and marketing, 103
- Case Studies of Commercial and Investment Selling, 104
- Effective Communication for Selling Commercial Investment Real Estate, 105
- Condominium conversions, Sale Leaseback
- Computer Analysis and Applications for Real Estate Investments

TYPES OF PROPERTIES MANAGED AND LEASED:

Downtown Office Buildings	Construction Management
Suburban Office Buildings	Apartment & Townhouse Projects
Shopping Centers and Malls	Condominium Associations
Single Family Homes	

SCOPE OF APPRAISAL, BROKERAGE AND CONSULTING ASSIGNMENTS:

Tax Certiorari Proceedings	Fair Market Rentals
Highest & Best Use Studies	Condemnation Actions
Feasibility Studies	Sidewalk & Roadway Easements
Valuation for Financing	Buyer, Seller Analysis
Investment Analysis Counseling	Employee Transfer Plans
Sale/Leaseback Transactions	Residential Surveys
Appraisal Review	Management Surveys
Syndication Analysis	Fractional Interests
Component Depreciation	Condominium Conversion Analysis
Adaptive Reuse Studies	Construction Conversion Analysis
Lease & Brokerage Negotiation	Tax Differed Exchange 1031

PROPERTY TYPES APPRAISED:

Condominiums	Condemnations
Shopping Centers	Firehouses
Partial Interests	Manufacturing & Warehouse
Service Stations	Apartment/Townhouse Projects
Banks	Railroad Property
Hotels & Motels	Waterfront Property
Office Buildings	Restaurants
Housing for Elderly	Agricultural Properties
Nursing Homes	Easement
Proprietary Homes for Adults	Transitional Acreage

MAI CERTIFICATION #6045

N.Y.S. CERTIFIED GENERAL REAL ESTATE APPRAISER #46000004874

GALVIN REALTY GROUP, INC.

PROFESSIONAL QUALIFICATIONS

of

MEREDITH LEIGH SILVERMAN

Vice-President

EDUCATION:

Rochester Institute of Technology – B.A. Degree Interior Design, Minor in Psychology

APPRAISAL INSTITUTE: 2014 - present

Basic Appraisal Principles

Basic Appraisal Procedures

National Uniform Standards of Professional Appraisal Practice (USPAP) 15 Hour

General Appraisal Income Approach/Part 1

General Appraisal Income Approach/Part 2

General Appraiser Sales Comparison Approach

Real Estate Finance, Statistics and Valuation Modeling

Standards and Ethics

TYPES OF PROPERTIES MANAGED AND LEASED:

Downtown Office Buildings

Suburban Office Buildings

Shopping Centers and Malls

Single Family Homes

Construction Management

Apartment & Townhouse Projects

Condominium Associations

SCOPE OF APPRAISAL AND CONSULTING ASSIGNMENTS:

Tax Certiorari Proceedings

Feasibility Studies

Buyer, Seller Analysis

Counseling

Management Surveys

Fair Market Rentals

Valuation for Financing

Investment Analysis

Residential Surveys

Lease & Brokerage Negotiation

PROPERTY TYPES APPRAISED:

Loft Buildings

Manufacturing & Warehouse

Residential & Commercial Vacant Land

Office Buildings

Apartment/Townhouse Projects

Multi-Purpose Commercial Buildings

N.Y.S. CERTIFIED GENERAL REAL ESTATE BROKER #30GA1031677

GALVIN REALTY GROUP, INC.

PARTIAL CLIENT LIST

Ablest, Inc.	Hafner Associates	Perry, Debes, Looney & Crane
ADDECO	Hampton Inn	Pittsford Place Mall
Allens Creek Office Park	Heidleberg	Pizza Hut
American Images	Hess Oil	Price Waterhouse
Applicon	Holiday Inn Express	Providence Insurance
B.R. DeWitt	Home Leasing Properties	Prudential Insurance
Key Bank	Homewood Suites	R.C Shaheen Companies
Bausche & Lomb, Inc.	Horus Pharmaceutical	R.L. Day
Blockbuster Video	Hudson Hotels Corporation	Ramada Inn
Buckingham Properties	Hyatt Hotels	Resolution Trusst Corporation
Burger King	I. Gordon Companies	RG & E
Canandaigua National Bank	Information Associates	Ruggeri & May, Inc.
Chase Bank	Interim Health	Ryco Management
Chemical Bank	J. Walter Thompson Agency	S & H Motivations
Citibank	Kidney Foundation	Shell Oil
Cogent Testing	Kinkos	Sibley Real Estate
Comfort Inn	Laidlaw	Smith, Kline, Beecham
Comparato Properties	Landsman Companies	Staubs Cleaners
Computer Land	M&T Bank	Syms Department Store
Conifer Development	Manpower	T.T. Bearing Inc
Cooper-Vision	Manufacturers Hanover Bank	TAD Technical Services
Country Inn & Suites	Marine Midland Bank	Techniplex
Cross Keys Office Park	Marketplace Chrysler-Plymouth	The Bank Josephine
CVS Development	Marshalls, Inc.	Tops Markets
Danka	McCoonville, Cooman et al	Travelers Insurance
Days Inn	Melles Griot Optical	Tucker Anthony
Dean Witter	Merrill Lynch	U.S. Fidelity & Guarantee
DiMarco Group	Metal Goods Division of Alcoa	Unipoly/Schlegel Corporation
Eastman Kodak	Micro House International	United States ATF
Edgewater Development	Morgan Management Properties	United States Secret Service
Empire Vision	Mutual of Omaha	Upstate Waterproofing
Eric Mower	Natapow Companies	University of Rochester
ESL Bank	Nationwide Insurance	Vandembergh Foods
Enright Computer Center	Nature Conservancy	VIP Structure
Essex Investment Group	Nesco Service Company	Visual Horizons
Farash Corporation	Niagara Assets Corp	Walgreen Development
Federal Express	Norry Companies	Wesley Nursing Home
First National Bank	Norstar Bank	Western Union International
Gannett Newspapers	Packetts Landing	Willowbrook Office Park
General Motors	Pagenet	Wilmot Companies
Genesee Cellular One	Paine Webber	WMF Huntoon Paige
Gleason Corporation	Paris, Kirwin	Woodman of the World
GMC Trucks	Perinton Hills Office Park	WXXI
Greisberger, Zicari, Hale	Perk Development	Xerox Corporation